

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

**HOLLY MAGALENGO on behalf  
of her daughter, A.M., a minor,**

*Plaintiff,*

v.

**UNITED STATES DEPARTMENT  
OF EDUCATION,  
PENNSYLVANIA  
INTERSCHOLASTIC ATHLETIC  
ASSOCIATION, INC.,  
QUAKERTOWN COMMUNITY  
SCHOOL DISTRICT, and  
COLONIAL  
SCHOOL DISTRICT,**

*Defendants.*

**Case No. 2:25-cv-00325**

**PLAINTIFF'S MOTION FOR TEMPORARY RESTRAINING ORDER**

NOW COMES Plaintiff, Holly Magalengo, as Guardian of A.M. by and through her attorneys and states as follows:

1. Plaintiff filed a complaint in the above referenced matter on January 20, 2025, seeking recovery for injuries resulting from Defendants violations of equal protection.

2. Plaintiff continues to suffer violations of her equal protection rights and will suffer further without the issuance of a temporary restraining order irreparable harm will result.

3. This motion is based on the grounds that the Plaintiff is likely to succeed on the merits, will suffer irreparable harm without the TRO, the balance of harm favors the Plaintiff, and the public interest supports granting the TRO.

4. Plaintiff met and conferred with Defendants. Defendant Colonial School District has indicated that they will oppose this motion. Defendant Pennsylvania Interscholastic Athletic Association, Inc. has provided that they concur in the relief sought.

WHEREFORE, the Plaintiff, by and through her undersigned counsel, respectfully requests that the Court grant this Motion for a Temporary Restraining Order to halt biological males from participating in women's sports.

Dated: February 25, 2025

Respectfully submitted,

/s/ Solomon Radner

Solomon Radner, Esq. (admitted pro hac vice)

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*Local Counsel for Plaintiff*